

Before the
Federal Communications Commission
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

*Petition of the Community Broadcasters
Association for Establishment of a "Class A"
Television Service*

9260
RM-9620

To: The Commission

COMMENTS OF ASIAVISION, INC.

Asiavision, Inc. ("Asiavision"), by its attorney, hereby supports the Petition for Rulemaking ("Petition") filed by Community Broadcasters Association for establishment of a new "Class A" television broadcast service. In support thereof, the following is stated:

Asiavision is a minority owned company that is the operator of four low-power television stations -- Stations WQAV-LP, Atlantic City, New Jersey; WRAV-LP, Ocean City, Maryland; WIAV-LP, Washington, DC; and KYAV-LP, Palm Springs, California. Asiavision strives to provide a variety of programming to the public, including multicultural programming, that is not otherwise provided or available to the public. Asiavision therefore is well acquainted both with the difficulties associated with establishing a viable low-power television operation, as well as the benefits that such services provide to the public.

After careful review and consideration, Asiavision wishes to voice its support of the Community Broadcasters Association proposal. Among the greatest challenges facing low-power television operations is (1) the lack of capital from traditional funding sources; (2) the inability to provide carriage over a wide area; and (3) the threat of displacement due to existing television and future digital stations. The Community Broadcasters Association proposal would alleviate the

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problems associated with all three issues.

First, if "Class A" status could be achieved by existing low-power television operations, the status will greatly enhance the coverage and financial stability of the broadcast facilities, thereby increasing the ability of low-power stations owners to qualify for funding from traditional lending sources. This will facilitate the ability of low-power stations to upgrade transmission and production facilities and to provide improved service to the public.

Moreover, at the present time, the low power nature of low-power television stations creates two problems (1) the stations have relatively small predicted service areas; and (2) the public has difficulty receiving the stations, even *within* the stations' predicted service areas. This is especially true with respect to stations licensed and attempting to provide service to metropolitan areas with large buildings. The signal density is not great enough generally to allow reception inside of some large buildings. Allowing low-power stations to potentially upgrade to "Class A" status will largely solve that problem, as well. For example, such an upgrade clearly would allow Asiavision to serve the public better, and to improve Asiavision's image in the community for its multicultural (e.g., Chinese, Korean, Vietnamese, Indian, South Asian, Haitian, Filipino, and Spanish) programs.

Finally, the proposed rules will grant to existing low-power stations that can upgrade to "Class A" status a certain degree of permanency that is needed to serve the public adequately. The financial commitment that is necessary to establish a well run low-power television station is not insignificant. By allowing studies to be submitted showing that a "Class A" operation can be established without harming existing analog or new emerging DTV operations, a grant of such facilities will reduce the risk of low power television operators losing their channels, thereby increasing the ability of station owners to engage in long-term planning and development for their

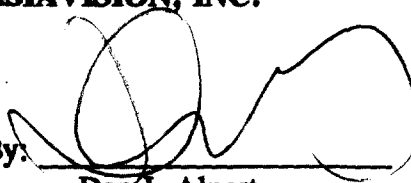
stations and facilities.

In short, the proposal represents a change in the Commission's Rules that is desperately needed. It is urged that the proposal be adopted as soon as practicable.

WHEREFORE, it is respectfully requested that the Petition for Rulemaking currently before the Commission for consideration be adopted.

Respectfully submitted,

ASIAVISION, INC.

By: 
Dan J. Alpert

His Attorney

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